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September 27, 2010

TO BE FILED UNDER SEAL

The Honorable L. Leo Glasser
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Doe, 98 CR 1101 (ILG)

Dear Judge Glasser:

We represent John Doe, the movant on an application for injunctive relief with respect to certain sealed and confidential documents.

On August 12, 2010, the Court so-ordered a Stipulated Standstill Order (the "Standstill") by and among Mr. Doe, Fred Oberlander, Jody Kriss and Michael Ejekam (the "Parties"). The Standstill is scheduled to expire today. The Parties have agreed to extend the Standstill, and have therefore executed the attached Amendment to Stipulated Standstill Order (the "Amendment").

We respectfully request that the Court so-order the Amendment.

Respectfully,



Kelly A. Moore

cc: Richard Lerner, Esq. (by email)
Stam Stamoulis, Esq. (by email)
AUSA Todd Kaminsky (by email)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

Plaintiff,

-against-

98 CR 1101 (ILG)

FILED UNDER SEAL

JOHN DOE,

Defendant.
-----X

AMENDMENT TO STIPULATED STANDSTILL ORDER

WHEREAS John Doe (the "Movant") and Frederick M. Oberlander and Jody Kriss (together with Michael Ejekam, "Respondents") executed a Stipulated Standstill Order so ordered by the Court on August 12, 2010 (the "Standstill Order");

WHEREAS the Standstill Order is scheduled to terminate on September 27, 2010;

WHEREAS the parties have agreed to extend the term of the Standstill Order;

NOW THEREFORE, Movant and Respondents, by and through their undersigned counsel, hereby stipulate and agree to, and request that the Court enter an order providing for, the following:

1. Paragraph "1.a." of the Standstill Order is amended to state as follows:

Movant's time to file the Supplemental Memorandum is adjourned until January 14, 2011, unless this agreement is terminated earlier pursuant to paragraph 4 below. If the agreement is terminated prior to January 14, 2011, then the Supplemental Memorandum shall be filed within one week of the termination date.

2. Paragraph "4.b." of the Standstill Order is amended to state as follows:

Unless so terminated, this stipulated standstill order shall terminate on January 14, 2011.

3. All other terms in the Standstill Order remain unchanged.

2010 09:54

212-309-7032

MORGAN LEWIS NY
Stamoulis & Weinblatt

09/24/2010 00:06 FAX 3027621688

Dated: New York, New York
September 27, 2010

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Stamatios Stamoulis

Attorney for Respondents Jody Kriss and Michael Ejekam

SO ORDERED


9/27/10 U.S.D.J.